

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE:	)	Case No. 21-05193
	)	(Subchapter V)
Ford City Condominium Association,	)	
	)	Chapter 11
Debtor.	)	
	)	Honorable Judge Deborah Thorne

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**TRUSTEE’S SECOND REPORT ON SPECIAL ASSESSMENT AND ELEVATORS**

William Avellone (the “*Trustee*”), the Subchapter V Trustee in the above captioned bankruptcy case of Ford City Condominium Association (the “*Debtor*”), by and through his undersigned counsel, and in accordance with the Court’s August 7, 2024 Order [ECF 323], hereby files his Second Report on the Special Assessment and Elevators on the property.

1. On August 7, 2024 Order [ECF 323] (although not in the minute order), the Court ordered that the Trustee file his second report outlining an accounting of the collection of the special assessment passed on June 6, 2024 (the “*Special Assessment*”) as well as any expenses or anticipated expenses for the elevator repairs at the property.

2. As of August 29, 2024, the Trustee has collected \$36,287.09 from the Special Assessment for all of July and August.

3. In accordance with the July 17, 2024 Order [ECF 319], the Trustee, on July 23, 2024, paid Ford City CH LLC, Ford City Nassim LLC and Ford City Realty LLC (referred to as “Ford City Mall”), the sum of \$8,327.76 of the funds collected from the Special Assessment.

4. The Trustee, on August 9, 2024, paid Elevator Industries the sum of \$6,000.00.

5. The Trustee is aware of pressing issues with the elevators on the property, to wit:  
(a) the elevator in the 4351 building is not operational; (b) the elevator in the high rise building

intermittently works but then fails for reasons unknown; and (c) the elevator in the 4281 building does not stop on the fifth floor with any consistency because of a wiring issue.

6. The Trustee anticipates that the cost to repair the elevator in the 4351 building to be \$26,000.00.

7. The Trustee is unaware of the actual cost to fix the elevator in the high rise but has been quoted a cost of \$4,758.00 as a down payment, but the work will be done on a time and materials basis at \$596/hour (which is the union rate for this work).

8. The Trustee is unaware of the actual cost to fix the elevator in the 4281 building, and the work will need to be done on a time and materials basis at \$596/hour (which is the union rate for this work).

9. The anticipated total to repair these issues is \$30,758.00, but the number is expected to be higher based on the time and materials billing of the elevator repair contractor(s).

10. Additional work is eventually needed on the elevators to remedy City of Chicago Code violations, including adding door restrictors, pit lighting and pit ladders to all elevators. That work also will be performed at \$596/hour and the contractor is requiring a \$29,290.00 down payment.

11. The hydraulic jacks will also need to be replaced in all the elevators, and the quoted price to perform that work is \$341,406.00.

12. The City of Chicago is also requiring fire-rated doors on the elevator machine rooms, and the quoted price to perform that work is \$15,734.33.

13. As of the date of this Report, there exists \$13,698.78 in outstanding invoices due and payable to elevator repair companies for completed work: (a) repair of a faulty relay in the 4351 building at a cost of \$1,512.00; (b) troubleshooting of the car not working in the 4281

building at a cost of \$2,399.15; (c) replacement of the conduit and wire in the 4281 building because the car was jumping at a cost of \$7,348.69; and (d) replacement of a faulty motor in the 4351 building at a cost of \$2,438.94.

14. Since the last report, our office sent out over 150 certified letters to unit owners who were delinquent on assessments, and have collected over \$70,000.00. These collections appear to have avoided the need for an additional special assessment and will allow the elevator work to get moving.

Dated: September 3, 2024

**WILLIAM AVELLONE, SUBCHAPTER V  
TRUSTEE**

By: /s/ Adam C. Toosley  
One of His Attorneys

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In re:	)	
	)	Chapter 11
FORD CITY CONDOMINIUM ASSOCIATION,	)	(Subchapter V)
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Debtor.	)	Case No. 21-05193
	)	
	)	Hon. Deborah L. Thorne
	)	

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**CERTIFICATE OF SERVICE**

I, Adam C. Toosley, an attorney, hereby certify that on September 3, 2024, I caused a true and correct copy of the foregoing *Second Report on Special Assessment and Elevators* to be filed electronically with the Court and served upon the following parties by the manner listed.

/s/ Adam C. Toosley

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